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Re: PCBs, PCDDs, and PCDFs at Sky Valley Education Center and Other Schools with past or current PCB Contamination

Dear Public Officials:

Following the letter dated March 19, 2019, additional environmental data and supporting documentation has become available from Environmental Health & Engineering. The documentation responds to agency requests for additional information. The original March 19 letter is attached for convenience.

In response to that letter, Department of Health Assistant Secretary Halvorson noted that "dioxins and furans are ubiquitous in air and are carried on air particles which may be trapped by building air filters." Naturally, people breathing the air are also exposed to dust through inhalation exposures. Our lungs act in part like the air filters that screen dust in classrooms. As Dr. Faeder stated in his July 30, 2019 letter (*see* attached), the Sky Valley "school dust values on the intake of the unit ventilators were a hundred to a thousand times higher than levels measured by the State Agency looking at PCDD and PCDF contamination statewide." *Id.* at 2. That is, the levels in Sky Valley are not ubiquitous or merely background levels of these toxic chemicals. These levels are a hundred to a thousand times higher than background levels. Agencies can compare these dust results to the dust

results collected at other contaminated sites, versus sites that are not contaminated. Dr. Faeder stated that the "most disturbing part about these incredibly high/contaminated levels of highly toxic compounds is that they represent dust that has only accumulated since the last filter change," which was July 2018, or roughly two years post-abatement of the primary sources of PCB contamination at Sky Valley. *Id.*

Our concern is for the safety of children and adults at schools such as Sky Valley with past or current PCB contamination. Dr. Faeder recommended that "Agencies should consider testing other schools in other districts for PCDDs and PCDFs, even if PCBs were measured there and deemed to be at a low level. The former compounds are hundreds or thousands of times more potent toxicants that the PCBs that could have been measured and may still be present." *Id.* at 3.

Please find enclosed additional data and supporting documentation:

- Letter by Edward Faeder, Ph.D., dated July 30, 2019, with three attachments;
- Attachment 1, Environmental Health & Engineering, Inc. Data Package;
- Attachment 2, Table. 1.0 Summary of Aroclors, PCB-TEQ and Dioxin/Furan TEQ Analyses for Samples Collected from the Indoor Environment at the Sky Valley Education Center, Monroe, WA; and
- Attachment 3, memos and photos regarding the classroom unit ventilators and filters.

With respect to PCB results, many shown in Attachment 2 relate to the January 2019 samples taken from the school. Several of the PCB results, however, relate to December 2015 carpet samples collected by a Sky Valley school teacher before the 2016 abatement of the primary sources of PCB contamination. Examples are found at Field ID# 184817 (Aroclor 1242 at 1,900 ppm) and Field ID# 184823 (Aroclor 1242 at 140,000 ppm):

184817	187074	PCB	Bulk-Carpet	East Pod, inner core	tan/beige carpet from inner core of pod	1900		A1242	ug/g
						435	J	Homologs	ug/g
						41.5	J,K	PCB-TEQ	ng/Kg
...									
184823	187070	PCB	Bulk-Carpet	Annex Bldg Room D	carpet with ballast oil spill, duct tape covering spill area	140000		A1242	ug/g

Questions regarding the Attachments can be directed to Kevin Coghlan at EH&E.

To our knowledge, no agency required testing for PCDDs and PCDFs at Sky Valley or other schools with past or current PCB contamination. As Dr. Faeder explained, "Many schools in many districts have used fluorescent light fixtures. And older ones had ballasts containing PCBs, and many ballasts failed releasing PCBs, PCDDs, and PCDFs into room environments," exposing children and adults "to these highly toxic chemicals." *See* 2-3.

We all should act to protect children and adults from toxic contamination in schools.

Sincerely,

Sean J. Gamble

Enclosures: as stated